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Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C.

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

In the Matter of

Advanced Television Systems
And Their Impact Upon The
Existing Television Broadcast
Service

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MM Docket No. 87-268

To: The Commission

SUPPLEMENT TO PETITION FOR RECONSIDERATION

University of New Hampshire d/b/a New Hampshire Public Television ("NHPT"), through its attorneys, hereby files this Supplement to its Petition for Reconsideration filed on June 13, 1997 with respect to the Sixth Report and Order, released April 21, 1997 in the above-captioned proceeding, which adopted the Digital Table of Allotments and related technical rules regarding the digital television broadcast service. In support thereof, the following is shown:

1. NHPT is the licensee of public Station WEKW-TV, Keene, New Hampshire, WENH-TV, Durham, New Hampshire, and WLED-TV, Littleton, New Hampshire. Its Petition for Reconsideration requested time to supplement its petition with technical data following the release of OET Bulletin No. 69 (OET-69). A majority of the petitions filed in this proceeding also requested a supplemental filing period. On July 2, 1997, concurrent with the release of OET-69, the Commission granted those parties that filed petitions for reconsideration the opportunity to file supplemental filings by August 22, 1997.

No. 87-268-014
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2. Attached hereto is an engineering statement prepared by NHPT's consulting engineer identifying specific digital channel substitutions in light of OET-69.

Specifically, NHPT requests that the Commission reassign DTV Channel 40 in substitution for DTV Channel 49 for Station WLED and that Station WEKW receive DTV Channel 14 in place of DTV Channel 52.

Respectfully submitted,

UNIVERSITY OF NEW HAMPSHIRE

By:


Steven C. Schaffer

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202/833-1700

Its Attorneys

August 22, 1997



ENGINEERING STATEMENT

Considering the fact that New Hampshire Public Television faces the possibility that both NTSC and DTV assignments would be outside the core if channels 2 - 47 are selected by the FCC, we request consideration of alternate channel assignments.

Our engineering staff researched an area approximately 100 miles from the Littleton, N.H. (Channel 49 - WLED) and Keene, N.H. (Channel 52 - WEKW) locations and determined that DTV channels were available that would fall within the core assignment structure regardless of which core was selected.

We requested Longley-Rice plots from the Department of Commerce, NTIA ITS services and our suggested DTV channels of 40 and 14 for current NTSC channels 49 and 52 respectively. The attached data shows that the suggested channels are not problematic regarding interference to other DTV or NTSC broadcast operations.

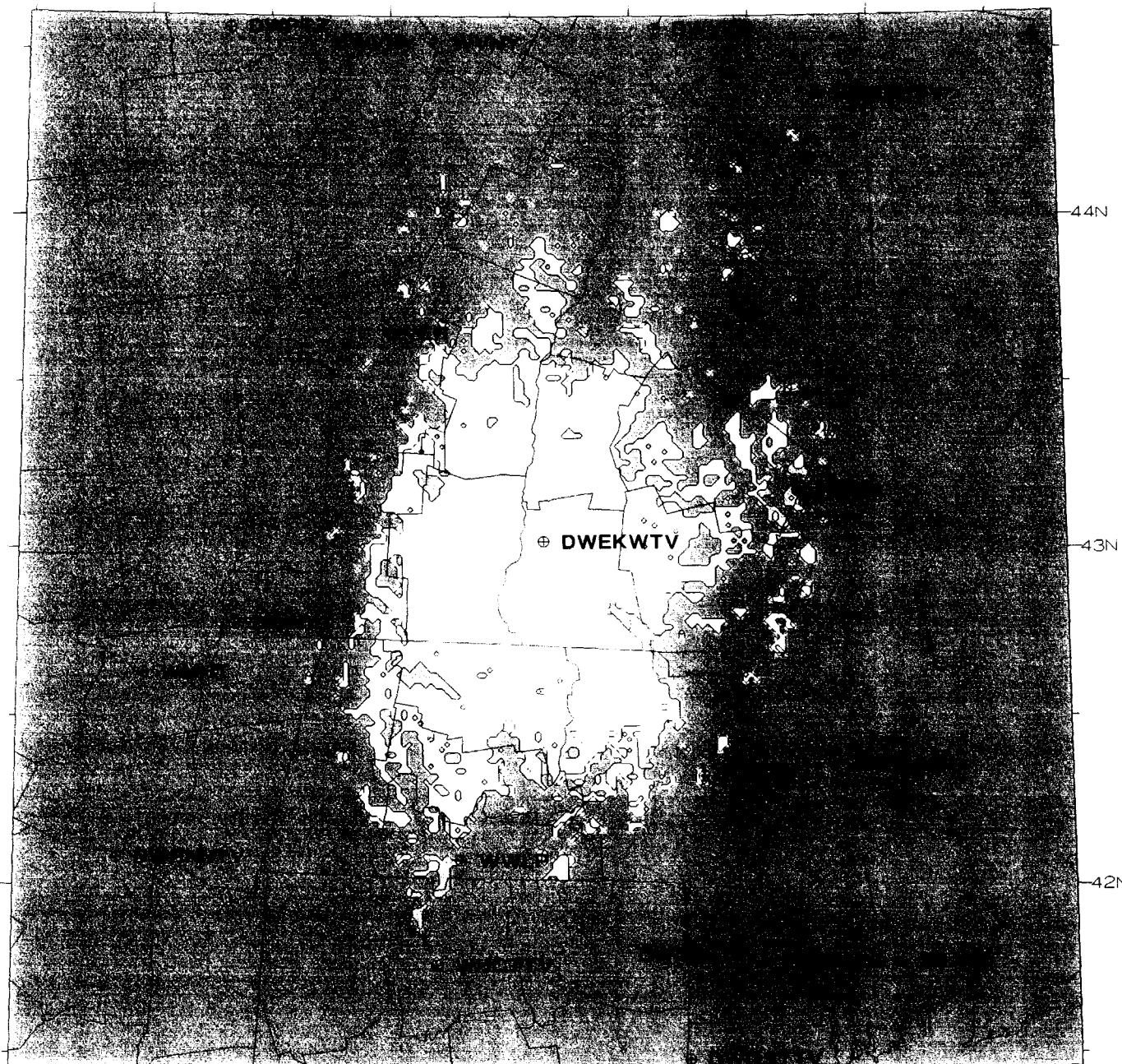
The financial implications of having to begin DTV operations on two channels that may be outside the core would be a burden on very scarce capital funds. Therefore, we are asking for relief in one of two ways.

1. Determining the core channels at a very early date.
2. If 2 - 46 becomes the core, that New Hampshire Public Television be reassigned DTV channels 40 for 49 - WLED and 14 for 52 - WEKW.

Respectfully submitted,

Bob Ross
Director of Engineering

TA Services
Bill Bumpus
DWEKW/14
21-Apr-97 22:41:13
RS363Aug1497B.ques



Signal to Interference ratio

□ No Interference
Area: 13900. sq km
Population: 505000.
Households: 187000.

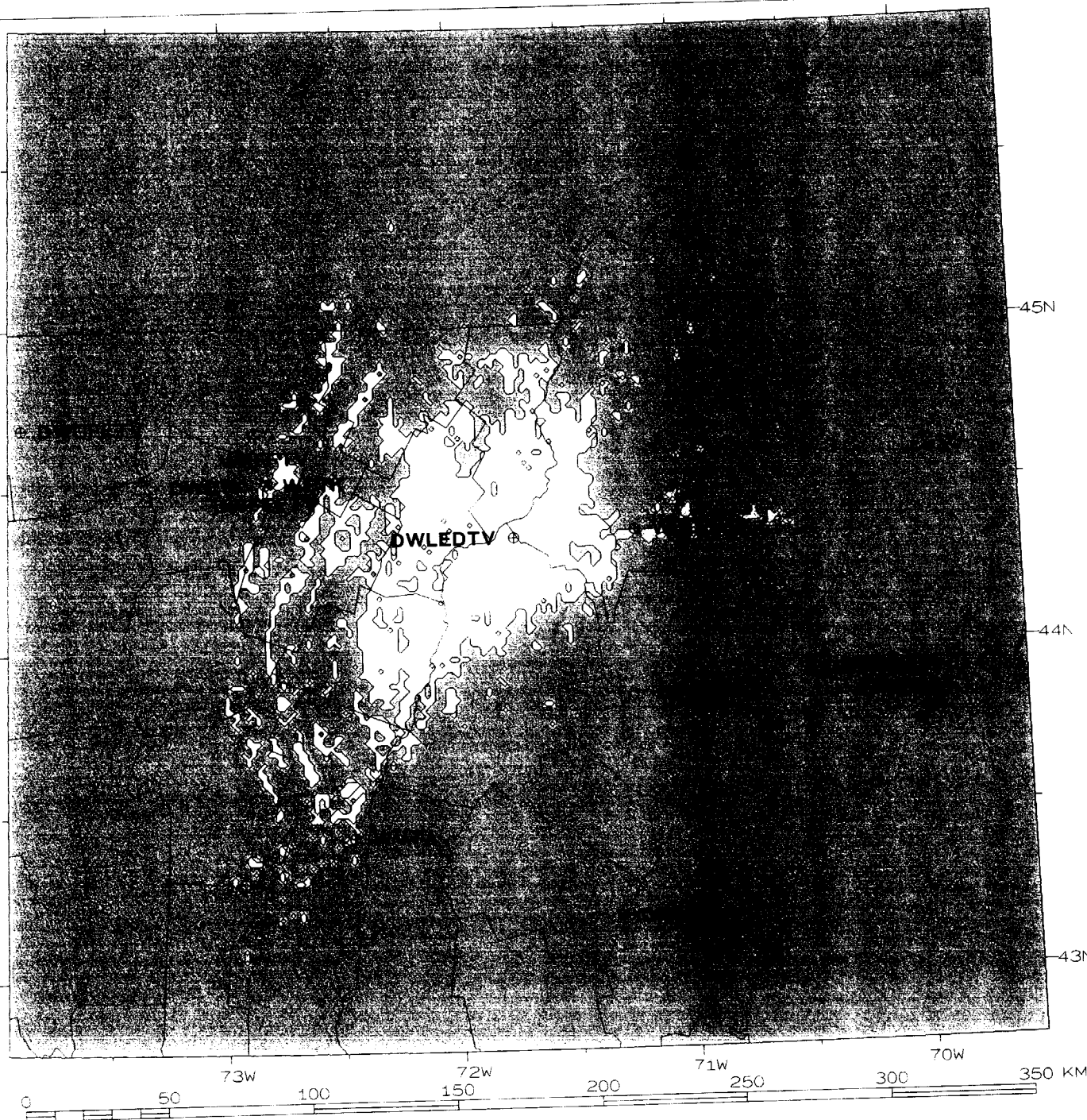
HDTV Interference
Area: 1090. sq km
Population: 50000.
Households: 17000.

NTSC Interference
Area: 250. sq km
Population: 22000.
Households: 8000.

Signal below minimum
Area: 107320. sq km
Population: 11890000.
Households: 4459000.

0 50 100 150 200 250 300 350 KM

TA Services
Bill Bumpus
DWLED/40
21-Apr-97 22:41:13
RS363Aug1497A.ques



Signal to Interference ratio

□ No Interference
Area: 8220. sq km
Population: 92000.
Households: 34000.

HDTV Interference
Area: 0. sq km
Population: 0.
Households: 0.

NTSC Interference
Area: 520. sq km
Population: 6000.
Households: 2000.

Signal below minimum
Area: 113820. sq km
Population: 2663000.
Households: 994000.